

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)
)
v.)
) 2:15-cr-193
ANN E. HARRIS,)
 Defendant)

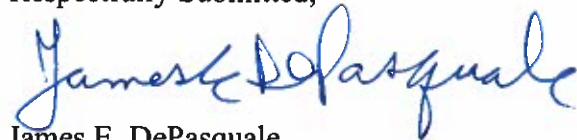
DEFENDANT'S SUPPLEMENTAL SENTENCING MEMORANDUM

When the famed writer (All The King's Men) and literary critic Robert Penn Warren was dying of cancer at the age of 84, he was being treated by a young oncologist in Vermont who had never heard of, much less read, Mr. Warren's work. Another physician in the practice realized who Mr. Warren was, and informed the young oncologist. The young oncologist then apologizes to Mr. Warren for not realizing that Warren had been awarded so many literary prizes, and was so famous in the literary world.

Mr. Warren's reply was that: "In the end, none of that means anything. In the end, your only worth is what your family thinks of you."

Attached are the following letters, all written on November 20, 2023, attesting to Ann Harris: (1) from her husband of 36 years, Richards Harris; (2) from her 36 year old only child, Rachel Harris; and (3) from Rachel's husband, Teddy Kenawell. Although she could easily do so, Ann Harris will not present at sentencing the testimony of an army of friends and colleagues. Nor will she submit any more character letters. The Family of Mrs. Harris says it all. For in the end, your only worth is what your family thinks of you.

Respectfully Submitted,



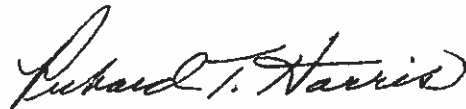
James E. DePasquale
1302 Grant Building
310 Grant Street
Pittsburgh, PA 15219
412-471-1415
jim.depasquale@verizon.net
PA ID: 30223

To the Honorable Joy Flowers-Conti:

It is my honor to write to you this letter on behalf of my wife Ann Harris. Ann has been my wife for over 36 years. Ann has a very positive outlook on life and can handle just about anything put in front of her. She is very kind to everyone and I do not know anyone who does not like her. She is always happy, cheerful and pleasant to be around. She is very dependable and trustworthy. She is very giving and put others in front of her needs. She is the mother of my daughter Rachel and the grandmother to Ryan and Weston. She is the key to our family. I have never known her to be disloyal or dishonest to anyone. That is not her nature - that is not how she was raised. Ann is my best friend and is involved in every aspect of my life. She conducts herself in a professional manner and is very dependable. She is one of the most busiest people/person I know. She has a full time job and it carries over into afterhours and weekends. She is responsible for answering phone calls at all hours of the day, night and weekends concerning her job and solving any issue that is needed. No matter who she would work for she would be an asset to any organization.

She is a wonderful wife and I love her very much. I would hope that you take this letter of truth that I have written in consideration of Ann.

Richard Harris

A handwritten signature in black ink that reads "Richard T. Harris". The signature is written in a cursive style with a large, stylized 'R' at the beginning.

412-443-1274

To The Honorable Judge Joy Flowers-Contr..

My name is Rachel Harris and Ann Harris is my mother. I wanted to take a moment to write about my mom and my hope is to convey how special she is to me.

I am 36 years old and the only child of my parents. I grew up in a safe and nurturing household, which instilled respect, responsibility and hard work. My mom and I are extremely close. She is an exceptional parent who has consistently provided and demonstrated love and support, not only toward me, but also toward my father, my husband, my children, family members and friends. Throughout my life she has been unwavering in her commitments and efforts as a mom. I have yet to meet another who parallels the same sort of contributions and sacrifices that she has made for me. She has prioritized my well being for the past 36 years, without complaint.

In times of angst in childhood and teenage years, her influence has been crucial in shaping my values, beliefs and self-esteem and self-image. In times of stress and anxiety in school and college, she has given me encouraging words and confidence to chase my dreams to achieve and grow as a person, to be self-sufficient and independent. She taught me how to overcome obstacles and persevere, not letting me give up on myself even when things seemed impossible.

In times of frustration with my job, she has been my teacher, teaching me the importance of kindness, empathy and compassion. Teaching me the importance of when to bite-my-tongue and when to stand up for myself.

She continues to be a positive impact for me, especially now that I am a mother myself. Growing up and to this day, she has prioritized me above all else. She has gone out of her way to ensure I grew up in a loving environment, one that celebrates every milestone. She has continued this commitment with her granddaughter (23 months old) and new grandson (3 months old). She finds no greater joy than being their grandmother. In times of confusion or question as a new mother, she has given gentle and encouraging advice and wisdom, reminding me of patience and gratitude.

My mom is my lifelong support system. Our bond is something my own daughter will witness with time and learn from. I could not have asked for any better role model, cheerleader, teacher, best friend. I am forever blessed to have her.

Please consider this letter when determining the outcome of this case.

Best regards,

Rachel Harris



(412) 496-1910

To The Honorable Judge Joy Flowers-Cont.

My name is Teddy Kenawell and Ann Harris is my mother-in-law. When finding out about this case, I wanted to write this letter in hopes to demonstrate the importance of Ann to our family.

I know the jokes about mother-in-laws, how there can be issues with boundaries and expectations. This couldn't be farther from the truth in my case, and I know how lucky I am to have that. I, unfortunately, wasn't blessed with a mother who was involved, so to watch Ann with my wife, my father-in-law and children was a new experience for me. Upon our first few meetings, Ann welcomed me into her family showing me a sense of belonging. She has showed me how important a mother is to a family dynamic. She calls me and asks me how my day at work was. She remembers birthdays and anniversaries and small details that I once didn't think needed celebrating. She sends us home more food than I can eat in a week. She plans and gets excited for trips and get-togethers in the future. She has involved my first daughter in holidays and shows a genuine concern for her well-being. She offers comfort and support whenever it is needed. She is warm and tender toward her grandchildren. She loves on them and makes them laugh from their bellies. She makes herself available on a moment's notice to watch them. She has played a significant role in my wife's life and I know this will continue into the lives of my own children. I couldn't have asked for a better role model and I am very blessed to have her as my mother-in-law.

Best regards,



Teddy Kenawell

(412) 770 - 7326